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8 *Attorneys for Defendants Irico Group Corp. and*
9 *Irico Display Devices Co., Ltd.*

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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL DIRECT PURCHASER ACTIONS*

20 *ALL INDIRECT PURCHASER ACTIONS*

**DECLARATION OF WYATT M. CARLOCK
IN SUPPORT OF IRICO DEFENDANTS'
OBJECTIONS TO SPECIAL MASTER'S
REPORT AND RECOMMENDATION OF
SEPTEMBER 1, 2023**

21 Judge: Honorable Jon S. Tigar
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1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Objections to Special Master’s Report and Recommendation of September 1,
7 2023. If called as a witness, I could and would testify to the matters set forth in this declaration of
8 my own personal knowledge.

9 2. Attached hereto as Exhibit A is a true and correct copy of the Special Master’s
10 August 4, 2023 Interim Report & Recommendation on Plaintiffs’ Motion for Discovery Sanctions,
11 ECF No. 6233.

12 3. Attached hereto as Exhibit B is a true and correct copy of the Special Master’s
13 September 1, 2023 Interim Report & Recommendation on Plaintiffs’ Motion for Discovery
14 Sanctions, ECF No. 6275.

15 4. Attached hereto as Exhibit C is a true and correct copy of a letter from Mr. John
16 Taladay addressed to the Honorable Judge Walker, copying Direct and Indirect Purchaser
17 Plaintiffs’ counsel, dated September 13, 2023.

18 5. Attached hereto as Exhibit D is a true and correct copy of a letter from Mr. R.
19 Alexander Saveri and Ms. Lauren C. Capurro addressed to the Honorable Judge Walker, copying
20 Irico Defendants’ counsel, dated September 14, 2023.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th
22 day of September, 2023, in Arlington, Virginia.

23
24 /s/ Wyatt M. Carlock

25 Wyatt M. Carlock (*pro hac vice*)
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